

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

*Yvonne Griffin %/o
[REDACTED] 7. M [REDACTED]*
Plaintiff(s))
vs. [REDACTED])
Syracuse City School District
Defendant(s))

Civil Case No.: 5:24-cv-1044
(GTS/MJK)

CIVIL
RIGHTS
COMPLAINT
PURSUANT TO
42 U.S.C. § 1983

Plaintiff(s) demand(s) a trial by: JURY COURT (Select only one)

U.S. DISTRICT COURT - N.D. OF N.Y.

FILED

AUG 26 2024

AT _____ O'CLOCK _____
John M. Domurad, Clerk - Syracuse

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1334(3) and (4) and 2201.

PARTIES

2. Plaintiff: *Yvonne Griffin %/o C [REDACTED] f. M [REDACTED]*
Address: *272 TAFT Avenue Apt. 1007
Syracuse, NY,
13206*

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: *Syracuse City School District*
Official Position: _____
Address: *725 Harrison St.
Syracuse, NY, 13202*

b. Defendant: _____

Official Position: _____

Address: _____

c. Defendant: _____

Official Position: _____

Address: _____

Additional Defendants may be added on a separate sheet of paper.

4.

FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

1. Prior to School yr ending in June 2023 The SCSD was put on notice by C.M. [REDACTED] OB/GYN Dr. [REDACTED] in September 2023 C. [REDACTED] OB/GYN DR. Quarles took C. [REDACTED] out of School (Approx. 3rd day of School). I went to the Main office and obtain a medical homebound app for my daughter. Her OB Dr. filled it out. Mr. [REDACTED] returned it to Romeo PSLA Bldg principal. He never turned it in. He infact said she didn't need it. C. [REDACTED] had a C-Section and was released back to School 11/4/2023. By her OB Dr. Canesha received NO EDUCATION, NO CLASSWORK, NO HOMEWORK, NO TUTORIAL, NO BOOKS, NO TEACHER. Nothing is on Record thru the SCSD except her return to school paperwork.

2. The SCSD Created an unsafe educational setting for C [REDACTED] and Y [REDACTED] Because of the disagreement in the amount of time the SCSD was taking to provide transportation for my children who were homeless McKinney Vento children thru SCSD the SCSD took out a BAN LETTER not allowing me to call the school my children were at, It prevented me from having no contact with even a nurse at PSLA without prior consent from Dr. Joshua Beerdall but it has to be 24 hrs or more prior to me calling him. In Jan 2024 both my daughters had told me that a group of girls were planning on jumping my daughter Y [REDACTED] to PSLA the next day and they wouldn't speak to me. I called Dr. Joshua Beerdall and he was on vacation. I then told the Sec. for Dr. Joshua Beerdall (H+R Sec) to have one of his co-workers call PSLA and speak to them about this. I then went to a RALLY and had to rush my event because both C [REDACTED] & Y [REDACTED] called me. I was under the impression the fight happened so I went to PSLA and went live on my Social Media because the School refused to give me my children. The fight happened 8 minutes AFTER I arrived to get both my children. Ultimately the SCSD, either lawfully, myself and C [REDACTED] all went into a Settlement Waiver agreement. She did not receive no education from the Jan 2024 incident until March when the waiver was signed.

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Denied her education while in her last pregnancy Month 9 during her recovery.
Sept 2023- Nov. 16th 2023

SECOND CAUSE OF ACTION

Presented a unsafe School educational Setting due to issuance of a Ban letter.
Jan 2024

THIRD CAUSE OF ACTION

Did not provide educational setting while on homebound

Jan 2024- March 2024

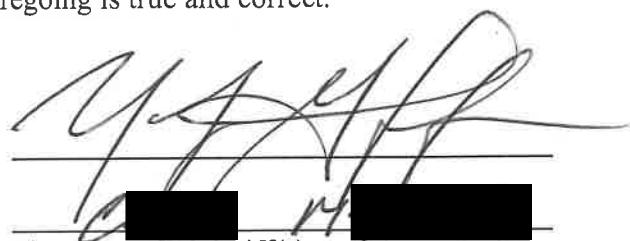
6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

finds in favor of the plaintiff C [REDACTED] M [REDACTED]
and find the SCSD at fault for denying her her
education and also creating a unsafe educational
setting thus denying her her education again.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Augus 26, 2024



[REDACTED]
[REDACTED]
Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010

AFFIDAVIT OF SERVICE BY MAIL

State of New York :
County of ONONDAGA : SS:

I, Yvonne Griffin, being duly sworn, deposes and says: that I am the plaintiff herein and served a copy of the following document(s):

on All Attached Documents (Specify document(s))
at: Syracuse City School District (Name of person/Addressee)
725 HARRISON ST (Address to which document(s)
were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located

at: _____,

on the following date: _____.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: _____

Signature of Plaintiff

Sworn to before me this _____ day of _____, _____.

Notary Public